

STATE OF TENNESSEE DEPARTMENT OF HUMAN SERVICES

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BILL LEE GOVERNOR

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DANIELLE W. BARNES

COMMISSIONER

July 7, 2020

Bridgett Stanfill, Owner Grandma's House Preschool and Child Development Center 401 Highway 149 Clarksville, Tennessee 37040-7208

Dear Ms. Stanfill,

The Department of Human Services (DHS) - Division of Audit Services staff conducted a limited desk review of the Child and Adult Care Food Program (CACFP) at Grandma's House Preschool & Child Development Center, Application Agreement number 00-299, during the period of March 25, 2020 through May 29, 2020. Our scope of the review was for reimbursement made to the Sponsor for February 2020.

Due to the outbreak and the risk that COVID-19 poses to the Sponsor and our staff, the review was limited to verification, based on review of the documents obtained from Sponsor, via e-mail, mail, or other electronic transmission of documents. We also, obtained confirmation from the feeding sites and Sponsor staff via telephone or e-mail relative to the operation and administration of the CACFP.

The purpose of this review was to determine if the Sponsor complied with USDA regulations set through the COVID-19 period, taking into consideration the waivers granted to the Sponsor's operation. Also, to determine if the Sponsor complied with the applicable *Title 7 of the Code of Federal Regulations* (CFR) applicable parts, provider agreements, and applicable Federal and State regulations.

Based on our review of the Sponsor's records and information provided, the Sponsor had two (2) affiliated centers operating during the review period. The center selected as the sample site was **Grandmama's House of Clarksville.**

<u>Important COVID-19 note</u>: Due the current outbreak and the risk that COVID19 poses to your organization personnel and our staff, all our staff are working from home with no or very limited access to the office. Therefore, we will not send a copy of this report via regular mail until further notice. Please confirm the receipt of this email as it is currently the option to communicate to you. If you need any assistance or have any questions, please do not hesitate to contact us via email.

Background

CACFP Sponsors utilize meal count sheets to record the number of breakfast, lunch, supper, and supplement meals served. Meals served by participating Sponsors must meet the minimum guidelines set by the United States Department of Agriculture (USDA) and DHS to be eligible for reimbursement. The CACFP Sponsor reports the number of meals served through the DHS Tennessee Information Payment System (TIPS) for reimbursement.

We inspected meal count sheets for our test period and reconciled the meals claimed for reimbursement to the meals reported as served for each meal service. We also reviewed documentation of the Sponsor's financial transactions including but not limited to purchases of food.

Our review of the Sponsor's documentation for February 2020 disclosed the following:

1. The Sponsor did not complete monitoring of its feeding sites as required

Condition

During the entrance conference on with the Sponsor on March 25, 2020, we requested monitoring documentation for the previous 12 months prior to the review period for the sample site. The Sponsor did not provide any monitoring documentation supporting any monitoring had been completed.

<u>Criteria</u>

Title 7 of the Code of Federal Regulations, Section 226.16(d)(4)(iii) states, "Sponsoring organizations must review each facility three times each year, except as described in paragraph (d)(4)(iv) of this section. In addition: (A) At least two of the three reviews must be unannounced; (B) At least one unannounced review must include observation of a meal service; (C) At least one review must be made during each new facility's first four weeks of Program operations; and (D) Not more than six months may elapse between reviews."

Recommendation

The Sponsor should ensure that the required monitoring is completed and timely.

2. The Sponsor provided menus that did not name the specific type of milk served

Condition

During the entrance conference with the Sponsor on March 25, 2020, we requested menus, food purchase receipts, and other supporting documentation for the meals claimed for the review period for the sample site. The Sponsor provided menus for breakfast, lunch, and supplements last listed "milk" but did not specify the type of milk served to participants.

We were able to determine that the correct milk types were purchased and in sufficient quantity for all meals claimed based on food purchase receipts provided. As a result, no meals were disallowed.

<u>Criteria</u>

Title 7 of the Code of Federal Regulations, Section 226.17(b)(4) states, "Each child care center participating in the Program shall claim only the meal types specified in its approved application

in accordance with the meal pattern requirements specified in §226.20.... Menus and any other nutritional records required by the State agency shall be maintained to document compliance with such requirements."

The USDA policy memorandum, <u>CACFP 17-2016 Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program</u>, states, "In order to ensure compliance with the milk requirements outlined in 7 CFR 226.20(a)(1) and this memorandum, centers and day care homes must document the type of milk served on their menu. This includes listing the fat content (e.g. whole, low-fat or 1%, and fat-free or skim) and if the milk is flavored. It is the responsibility of the State agency or sponsor, as applicable, to further ensure that the correct type of milk is being served when conducting reviews."

Recommendation

The Sponsor should ensure menus reflect and meet the meal requirements established by the USDA.

Technical Assistance Provided

During our desk review for February 2020, the Sponsor was provided technical assistance regarding the updated "And Justice for All" poster and ensuring monitoring is completed timely.

Corrective Action

The Sponsor must complete the following actions within 30 days from the date of this report:

Prepare and submit a corrective action plan to address the deficiencies identified in this report. The corrective action plan template is attached. Please return the corrective action plan to:

AuditServices.CAPS.DHS@tn.gov

If you have questions relative to the corrective action plan, please contact:

Allette Vayda, Director of Operations Child and Adult Care Food Program James K. Polk Building, 15th Floor 505 Deadrick Street Nashville, Tennessee 37243 Allette.Vayda@tn.gov (615) 313-3769

We appreciate the assistance provided during this review. If you have any questions regarding this report, please contact Sean Baker, Audit Director 2, at 615-313-4727 or Sean.Baker@tn.gov.

Sincerely,

Sam O. Alzoubi, CFE Director of Audit Services

Sam O. Alzoubi

Exhibits

cc: Paige Cook, Director, Grandma's House Preschool and Child Development Center Allette Vayda, Director of Operations, Child and Adult Care Food Programs Debra Pasta, Program Manager, Child and Adult Care Food Program Elke Moore, Administrative Services Assistant 3, Child and Adult Care Food Program Constance Moore, Program Specialist, Child and Adult Care Food Program Marty Widner, Program Specialist, Child and Adult Care Food Program Comptroller of the Treasury, State of Tennessee

EXHIBIT A

Sponsor of Affiliated Centers Program Data

Name of Agency: Grandmas House Preschool and Daycare Center

Review Month/Year: February 2020

Total Meal Reimbursement Received: \$8,068.45

Program Area	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	20	20
Number of Sites	2	2
Number of Breakfast Served	2,989	2,989
Number of Lunch Served	2,769	2,769
Number of Supplements Served	4,472	4,472

Exhibit B

Sample Affiliated Center Program Data

Site Meal Service Reconciliation and Monitor Activity	Reported on Claim	Reconciled to Documentation
Total Days of CACFP Food Service	20	20
Total Attendance	2,436	2,436
Number of Breakfast Served	1,659	1,659
Number of Lunch Served	1,356	1,356
Number of Supplements Served	2,254	2,254
Number of Participants in Free Category	31	312
Number of Participants in Reduced-Price Category	10	10 ²
Number of Participants in Paid Category	106	1062
Total Number of Participants	147	1472

¹The difference in the reported and verified is immaterial and was not included in this report as a finding

²The number of participants and their classifications was not verified due to the limited review because of COVID 19